

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
)	
V.)	No. 4:10CR00648 ERW
)	
)	
ALLEN DEAN RITCHIE,)	
)	
Defendant.)	

RESPONSE IN OPPOSITION OF MOTION FOR EARLY TERMINATION

Comes now the United States of America, by and through its attorneys, Richard Callahan, United States Attorney for the Eastern District of Missouri and Tracy Lynn Berry, Assistant United States Attorney for said district, and submit the following response to defendant's motion for early termination of probation:

1. Defendant's period of supervision commenced on May 6, 2013.
2. On February 19, 2015, the United States Probation Office filed a non-compliance report in which it advised this Honorable Court that defendant was substantially in errors of making his restitution payments. At that time, his last payment had been in October 2014 leaving a balance of \$6,764.82 of the \$7,455.82 restitution he was ordered to pay.
3. Since defendant received a letter of reprimand for Supervising Probation Officer Jo Cooper and was referred to the Money Smart Program, he has made only three payments, those being on: March 13, 2015; April 15, 2015; and, September 25,

2015.

4. Had defendant complied with the terms of his supervision, and paid \$150.00 in restitution as ordered, his outstanding restitution balance would have been less than \$3,000.00 rather than the \$4,790.82 currently remaining.

As defendant has not made any restitution payments in more than two months, and owes a substantial sum toward restitution, the government requests that early termination of defendant's term of supervision is inappropriate.

Accordingly, the United States requests that this Honorable Court deny defendant's motion for early termination of probation.

Respectfully submitted,

RICHARD CALLAHAN
United States Attorney

s/ Tracy L. Berry
TRACY L. BERRY 014753 TN
Assistant United States Attorney
111 South 10th Street, Rm. 20.333
St. Louis, Missouri 63102
314-539-2200

CERTIFICATE OF SERVICE

Copy of the foregoing will be mailed to defendant November 27, 2015 at the following address: 7127 Horner Avenue B, St. Louis, Missouri 63117.

s/ Tracy Lynn Berry
ASSISTANT UNITED STATES ATTORNEY